

D I C K S T E I N S H A P I R O M O R I N & O S H I N S K Y L L P

1177 Avenue of the Americas • New York, NY 10036-2714
Tel (212) 835-1400 • Fax (212) 997-9880
Writer's Direct Dial: (212)835-1446
E-Mail Address: goodman@dsmo.com

June 7, 2005

VIA FACSIMILE AND U.S. MAIL

Martin F. McMahon, Esq.
Martin F. McMahon & Associates
1150 Connecticut Ave., NW
Suite 900
Washington, DC 20036

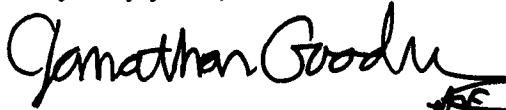
Re: *Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., 04cv07065 (MDL 1570)*

Dear Mr. McMahon:

We are in receipt of Chris Brown's email request for an extension on the response date for Dallah Al Baraka. As you know, this is the second time that Dallah Al Baraka has not met its stipulated deadline for filing a response. We previously proposed a briefing schedule to which we received no timely response. In the spirit of cooperation and efficiency, we agree to extend Dallah Al Baraka's time to answer or otherwise respond to thirty (30) days from the date of this letter and will set our opposition papers, if any, as due forty-five (45) days from receipt of your client's papers. To best serve judicial economy and the efficient use of the parties' resources, we condition this extension on your agreement to set the due dates for Cantor Fitzgerald's and The Port Authority's oppositions to the motions to dismiss of Saleh al Kamel and Al Baraka as seventy-five (75) days from the date of this letter. In the interim, we will continue to consider your requests for dismissal of these entities as is set forth in your letters to Kenneth Adams of May 10, 2005 and May 17, 2005, but believe that any decision in this regard is premature at this point.

Please let me know as soon as possible that you agree to this schedule.

Very truly yours,



Jonathan M. Goodman

cc: Kenneth L. Adams, Esq.
Christopher Brown, Esq.